REMARKS

This is a full and timely response to the Office Action of June 18, 2007. By the present

Amendment, claims 1, 9, 10, 27 and 28 have been amended to more particularly and distinctly point

out the novelty and non-obviousness of the present invention. It is requested that claims 19 and 20

be cancelled without prejudice. Reconsideration and allowance of the application and all presently

pending claims are respectfully requested.

As disclosed in the specification of the presently pending application (U.S. Publication No.

2004/0102201), the present invention provides a system and method for language translation using

remote devices which can detect topics and recognize context in messages to be translated (see

paragraphs 0056-0065). In one aspect, the present invention can segment text into its constituent

stories, identify original topics and match content to those topics already identified. In a further

aspect, the present invention can match content words in the input stream of the message to be

translated with nodes in an ontological database. The present invention employs the ontologies

for topic detection in real-time speech and text translation. Thus, unlike statistical-based topic

detectors, the present invention requires very little context to make a topic detection.

Accordingly, the speed *and* accuracy of translation are increased dramatically. Such advantages

are particularly prized within the realm of real-time short message translation using remote

devices.

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Response to 35 USC 102 and 103 rejections

In the Office Action dated June 18, 2007, the Examiner has rejected claims 1, 5, 8-12, 15-20, 24 and 27 under 35 USC 102(b) based on U.S. Patent Application Publication No. 2002/0069048 to Sadhwani et al. (hereinafter "Sadhwani"). The Examiner has further rejected claims 28, 29 and 30 under 35 USC 102(b) based on U.S. Patent No. 5,535,120 to Chong et al. (hereinafter "Chong"). The Examiner has further rejected claims 2-4, 6-7, 21-23 and 25-26 under 35 USC 103(a) as being unpatentable based on Sadhwani in view of U.S. Patent Application Publication No. 20040259531 to Wood et al. (hereinafter "Wood"). Based on the above amendments and the present remarks, Applicant submits that these rejections have been traversed and that the present claims are allowable over all prior art of record, considered singly or in combination.

By the present amendment, claim 1 has been amended to recite that the message translation is performed using a first selected translation dictionary from a plurality of available translation dictionaries, wherein the first selected dictionary is selected according to a topic detected by matching words in the first SMS message to nodes in an ontological database. Claim 9 has been amended to recite that the claimed method includes the further steps of receiving a second SMS message, detecting a second topic using a second selected translation dictionary from the plurality of available translation dictionaries, with the second selected translation dictionary being different from the first selected translation dictionary. As described above, this

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capability allows the present invention to fluidly perform accurate and fast translations for communications that can change topic rapidly, as ordinary voice communications, e-mails and text messaging are known to do.

Claim 10 has been amended to include the step of translating the SMS message from a first language of the identified language pair to a second language of the identified language pair using a first selected translation dictionary from a plurality of available translation dictionaries, wherein the first selected dictionary is selected according to a topic detected by matching words in the first SMS message to nodes in an ontological database. Claims 27 and 28 have been amended similarly to claim 10.

Support for these amendments can be found, for example, in paragraphs 0056-0065 and Fig. 2 of the present application publication.

The Sadhwani reference

The Sadhwani reference cited by the Examiner describes a system for transmitting information from a first device to a second device and optionally translating the information along the way. A wide variety of devices, languages and message types are described; however, the Sadhwani reference merely refers to known software applications for translation (see paragraph 0055). There is no discussion whatsoever of context or topic recognition in Sadhwani. Indeed, there is no single mention of either term in the entire disclosure. Accordingly, Sadhwani

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teaches nothing with regard to detecting a topic of a message to be translated, and employing a dictionary based on the detected topic.

Because Sadhwani does not teach each and every element of the invention as claimed in the independent claims, there can be no rejection based on 35 U.S.C. § 102. Further, because Sadhwani does not suggest or provide motivation for the claimed invention, either singly or in combination with any other reference of record, there can be no rejection of these claims under 35 U.S.C. § 103. The prior art must teach or suggest *all* claim elements in order to find anticipation or obviousness, and *all* words in a claim must be considered in judging the patentability of that claim against the prior art (see MPEP §§ 706.02(j) and 2143.03). Applicant therefore respectfully submits that the invention as presently claimed is not disclosed or suggested by the prior art of record. Applicant further submits that each of the dependent claims is similarly allowable as being dependent from an allowable independent claim.

The Chong reference

Applicant submits that the Chong reference neither teaches nor suggests the invention as claimed herein. Chong discloses no topic detection capability that performs by matching words in a given message with nodes in an ontological database, as claimed in the above independent claims. Indeed, there is no discussion of topic detection in Chong, no mention of the word "topic" therein, and where Chong describes its methods of machine translation, topic detection is not identified even generally (see column 10, lines 1-11).

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For the above reasons, Applicant submits that neither the Sadhwani nor Chong reference, either singly or in combination with Wood or any other reference, discloses, teaches or suggests the invention of the claims as presented by this Amendment. Applicant thus submits that these claims are allowable, and that the remaining dependent claims are also allowable based upon being dependent from an allowable independent claim.

Response to Provisional Double Patenting Rejection

It is requested that claims 19 and 20 be cancelled from the present application without prejudice. Accordingly, the provisional double patenting rejection on pages 2-3 of the Office Action is hereby moot.
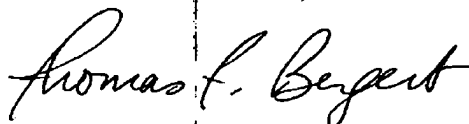
CONCLUSION

For all of the above reasons, Applicant submits that none of the cited references, taken either singly or combined, teaches or suggests the system and method of the present invention as presently claimed, and that the rejections in the Office Action of June 18, 2007 have been traversed. Applicant believes that all of the claims currently pending in the present application are now in condition for allowance, and an early notice to that effect is earnestly solicited. Should there be any outstanding issues requiring discussion that would further the prosecution and allowance of the present application, the Examiner is invited to contact Applicant's undersigned representative at the address and phone number provided below. A petition for three-month extension of time is being filed simultaneously with this Amendment.

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The Commissioner is hereby authorized to charge Deposit Account No. 50-0766 in payment

of the required fees.

Respectfully submitted,
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Attached: Petition for 3-month extension of time

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